



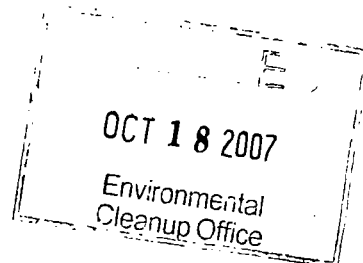
ASDSF

19.3.20.1 V2

5219 N. Shirley St., #100  
Tacoma, WA 98407  
P: (253) 752-2185  
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www.PointRuston.com

October 15, 2007

Mr. Kevin L. Rochlin  
Remedial Project Manager  
U.S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue, ECL-111  
Seattle, WA 98101



RE: Monthly Report: No. 136, September 2007  
Operable Unit No. 02  
Asarco Tacoma Smelter Site

Dear Mr. Rochlin:

Point Ruston is submitting this monthly report per the requirements of paragraph 48 of the Consent Decree for the above referenced site. Point Ruston will continue to provide monthly reports to EPA for the site organized in the same manner as previous reports prepared by Asarco to follow item (a) through (g) of this paragraph.

If you have any questions, please call me.

Sincerely,

Sue O'Neill  
Site Manager

Attachment (2 copies)

cc: Chung Ki Yee - Washington Department of Ecology  
Evan Griffiths - CH2MHill (2 copies)  
Richard Kauffman - ATSDR c/o U.S. EPA Region 10  
Leslie Ann Rose - Citizens for a Healthy Bay

USEPA SF



1288310

*A. Actions taken to achieve compliance with the Consent Decree during the previous month.*

1. A regular monthly design review meeting was not held in September.
2. Amendments to Asarco's final Upland Remediation Design (September 2006) are being prepared consistent with the Second Amendment to the Consent Decree.
3. Remedial Action activities continued.

*B. Summary of sampling, tests, and all other data received or generated by Point Ruston in the previous month.*

1. Outfall activities including the following:

Section 2.3 of the Final Statement of Work (SOW) for Remedial Design and Remedial Action – Exhibit F to the Second Amendment requires Point Ruston to continue outfall monitoring. Outfalls will be monitored to determine if the monthly average surface water outfall concentrations for arsenic, copper, and zinc exceed 0.5 ppm at the North and South site outfalls until they are abandoned.

Weekly composite samples will be collected at each outfall during the construction season. During the winter season, outfall samples will be collected every other month. Asarco began the following schedule in May of 2003 which Point Ruston will continue to implement: weekly composite samples will be collected from May-October, and in December, February, and April.

Monthly averages and individual results for samples collected by Point Ruston from August 27<sup>th</sup> through September 17<sup>th</sup> are attached. There was no exceedance of the interim discharge limits.

2. Point Ruston collects OCF leachate in a 5,000 gallon polyethylene tank for offsite shipment and disposal. LCRS and LDCRS volumes are monitored weekly in accordance with the draft OCF OMMP. LCRS volumes currently average approximately 209 gallons per day on the LCRS. Point Ruston shipped 4,450 gallons of leachate (4.9 ppm results attached) on September 11, 2007.
3. Point Ruston completed air monitoring at the perimeter of Stack Hill during stack base demo operations and final remediation grading. Results of samples collected from August 20<sup>th</sup> through September 25<sup>th</sup> are attached. There were no exceedances. Perimeter air sampling at Stack Hill was discontinued in September 2007 following remediation completion of the Stack Hill property in August 2007.

*C. Work Plans and other deliverables completed and submitted during the previous month.*

1. No comments were received from EPA during the month of September.
2. Remedial Action during September included the following tasks:
  - OCF construction activities:
    - Maintained leachate collection system and shipped leachate for offsite treatment as necessary to maintain adequate storage capacity in the temporary storage tank.
  - Stack Hill construction activities:
    - Maintained erosion and surface water controls
    - Completed post-remediation sampling by lot and preparation of post-remediation maps Remediation of the Stack Hill property was completed in August 2007. Results of Stack Hill Lot Sampling and property maps were submitted to EPA on September 10, 2007.
    - Completed perimeter air monitoring
  - Site Capping construction activities:
    - Continued concrete sorting and sizing
    - Placed residential soils and Stack Hill soils as subgrade
    - Maintained erosion and surface water controls
  - Site-wide remediation activities:
    - Continued surface water controls
    - Maintained haul roads and stockpiles onsite

*D. Actions scheduled for the next six weeks.*

1. Point Ruston anticipates receiving comments from EPA on the Construction Management Plan, Construction Quality Assurance Plan and Performance Standards Verification Plan submitted to EPA on June 22<sup>nd</sup>.
2. The following Remedial Action tasks are planned to continue:
  - RA Monitoring:
    - Outfall sampling (weekly composite samples) during scheduled months
  - OCF construction activities:
    - Continue collection of leachate for offsite disposal
    - Continue monitoring of leachate volumes
  - Stack Hill construction activities:
    - Erosion controls and site maintenance
  - Site Capping construction activities:
    - Concrete sorting and sizing.
  - Site-wide construction activities:
    - Continue surface water controls
    - Maintain roads and stockpiles onsite

Monthly Report No. 136, September 2007

Operable Unit 02

Asarco Tacoma Smelter Site

*E. Percentage completion, unresolved delays encountered or anticipated that may affect schedule, and efforts to mitigate delays.*

1. Point Ruston Remediation Design is under revision based on comments from EPA.

*F. Modifications to work plans or schedules proposed to or approved by EPA.*

1. The Second Amendment to the Consent Decree was finalized and the sale of the property to Point Ruston LLC completed on October 31, 2006.

*G. Activities undertaken to support Community Relations Plan during the previous month and planned for the next four weeks.*

1. Point Ruston attends the Town of Ruston's Town Council meetings routinely to answer question or give briefings regarding the status of RA and development planning activities (1<sup>st</sup> and 3<sup>rd</sup> Monday of each month).
2. Point Ruston is working with the City of Tacoma on development plans which incorporate remediation components for the site.
3. Point Ruston is working with MetroParks to incorporate the capping component into the Peninsula Park design.
4. Point Ruston meets with the Town of Ruston, City of Tacoma and MetroParks to address operation, maintenance, and monitoring issues at the site.

Table 1. Summary of September 2007 Outfall Data for As, Cu, and Zn Compared to SOW Limit

Location	As Conc. ppm	% of SOW Limit*	Cu Conc. ppm	% of SOW Limit*	Zn Conc. ppm	% of SOW Limit*
South Outfall	0.000	0.00%	0.008	1.50%	0.005	1.00%
North Outfall	0.000	0.00%	0.000	0.00%	0.000	0.00%

\* 0.5 ppm is the limit of As, Cu, and Zn allowed as documented in the SOW.  
Non-detect = 0.000



## LABORATORY ANALYTICAL REPORT

**Client:** Point Ruston LLC  
**Project:** Tacoma Smelter Outfall Monitoring  
**Lab ID:** B07091643-001  
**Client Sample ID:** TSM0807427

**Report Date:** 09/26/07  
**Collection Date:** 08/27/07 15:10  
**Date Received:** 09/19/07  
**Matrix:** Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	ND	mg/L		0.1		E200.7	09/20/07 21:45 / rh
Copper	ND	mg/L		0.01		E200.7	09/20/07 21:45 / rh
Zinc	ND	mg/L		0.01		E200.7	09/20/07 21:45 / rh

**Report** RL - Analyte reporting limit.  
**Definitions:** QCL - Quality control limit.

MCL - Maximum contaminant level.  
ND - Not detected at the reporting limit.



## LABORATORY ANALYTICAL REPORT

**Client:** Point Ruston LLC  
**Project:** Tacoma Smelter Outfall Monitoring  
**Lab ID:** B07091643-002  
**Client Sample ID:** TSM0807127

**Report Date:** 09/26/07  
**Collection Date:** 08/27/07 15:20  
**Date Received:** 09/19/07  
**Matrix:** Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	ND	mg/L		0.1		E200.7	09/21/07 10:14 / rh
Copper	ND	mg/L		0.01		E200.7	09/21/07 10:14 / rh
Zinc	ND	mg/L		0.01		E200.7	09/21/07 10:14 / rh

**Report** RL - Analyte reporting limit.  
**Definitions:** QCL - Quality control limit.

MCL - Maximum contaminant level.  
ND - Not detected at the reporting limit.



## LABORATORY ANALYTICAL REPORT

**Client:** Point Ruston LLC  
**Project:** Tacoma Smelter Outfall Monitoring  
**Lab ID:** B07091643-003  
**Client Sample ID:** TSM0907404

**Report Date:** 09/26/07  
**Collection Date:** 09/04/07 10:45  
**Date Received:** 09/19/07  
**Matrix:** Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	ND	mg/L		0.1		E200.7	09/21/07 10:17 / rh
Copper	ND	mg/L		0.01		E200.7	09/21/07 10:17 / rh
Zinc	ND	mg/L		0.01		E200.7	09/21/07 10:17 / rh

**Report** RL - Analyte reporting limit.  
**Definitions:** QCL - Quality control limit.

MCL - Maximum contaminant level.  
ND - Not detected at the reporting limit.





## LABORATORY ANALYTICAL REPORT

Client: Point Ruston LLC  
Project: Tacoma Smelter Outfall Monitoring  
Lab ID: B07091643-004  
Client Sample ID: TSM0907104

Report Date: 09/26/07  
Collection Date: 09/04/07 10:53  
Date Received: 09/19/07  
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	ND	mg/L		0.1		E200.7	09/21/07 10:21 / rh
Copper	ND	mg/L		0.01		E200.7	09/21/07 10:21 / rh
Zinc	ND	mg/L		0.01		E200.7	09/21/07 10:21 / rh

Report Definitions: RL - Analyte reporting limit.  
QCL - Quality control limit.

MCL - Maximum contaminant level.  
ND - Not detected at the reporting limit.



## LABORATORY ANALYTICAL REPORT

**Client:** Point Ruston LLC  
**Project:** Tacoma Smelter Outfall Monitoring  
**Lab ID:** B07091643-005  
**Client Sample ID:** TSM0907410

**Report Date:** 09/26/07  
**Collection Date:** 09/10/07 09:10  
**Date Received:** 09/19/07  
**Matrix:** Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	ND	mg/L		0.1		E200.7	09/21/07 10:25 / rh
Copper	0.02	mg/L		0.01		E200.7	09/21/07 10:25 / rh
Zinc	0.01	mg/L		0.01		E200.7	09/21/07 10:25 / rh

**Report** RL - Analyte reporting limit.  
**Definitions:** QCL - Quality control limit.

MCL - Maximum contaminant level.  
ND - Not detected at the reporting limit.



## LABORATORY ANALYTICAL REPORT

**Client:** Point Ruston LLC  
**Project:** Tacoma Smelter Outfall Monitoring  
**Lab ID:** B07091643-006  
**Client Sample ID:** TSM0907110

**Report Date:** 09/26/07  
**Collection Date:** 09/10/07 09:15  
**Date Received:** 09/19/07  
**Matrix:** Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	ND	mg/L		0.1		E200.7	09/21/07 10:28 / rh
Copper	0.02	mg/L		0.01		E200.7	09/21/07 10:28 / rh
Zinc	0.01	mg/L		0.01		E200.7	09/21/07 10:28 / rh

**Report** RL - Analyte reporting limit.  
**Definitions:** QCL - Quality control limit.

MCL - Maximum contaminant level.  
ND - Not detected at the reporting limit.



## LABORATORY ANALYTICAL REPORT

Client: Point Ruston LLC  
Project: Tacoma Smelter Outfall Monitoring  
Lab ID: B07091643-007  
Client Sample ID: TSM0907417

Report Date: 09/26/07  
Collection Date: 09/17/07 09:45  
Date Received: 09/19/07  
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	ND	mg/L		0.1		E200.7	09/21/07 10:39 / rh
Copper	ND	mg/L		0.01		E200.7	09/21/07 10:39 / rh
Zinc	ND	mg/L		0.01		E200.7	09/21/07 10:39 / rh

Report Definitions: RL - Analyte reporting limit.  
QCL - Quality control limit.

MCL - Maximum contaminant level.  
ND - Not detected at the reporting limit.



## LABORATORY ANALYTICAL REPORT

Client: Point Ruston LLC  
Project: Tacoma Smelter Outfall Monitoring  
Lab ID: B07091643-008  
Client Sample ID: TSM0907117

Report Date: 09/26/07  
Collection Date: 09/17/07 10:00  
Date Received: 09/19/07  
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	ND	mg/L		0.1		E200.7	09/21/07 10:50 / rth
Copper	0.01	mg/L		0.01		E200.7	09/21/07 10:50 / rth
Zinc	0.01	mg/L		0.01		E200.7	09/21/07 10:50 / rth

Report Definitions: RL - Analyte reporting limit.  
QCL - Quality control limit.

MCL - Maximum contaminant level.  
ND - Not detected at the reporting limit.



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800-735-4489 • 406-252-6325 • 406-252-6069 fax • eli@energylab.com

## LABORATORY ANALYTICAL REPORT

Client: Point Ruston LLC  
Project: Tacoma Smelter OCF Leachate  
Lab ID: B07090372-001  
Client Sample ID: TSM090704

Report Date: 09/07/07  
Collection Date: 09/04/07 10:20  
Date Received: 09/06/07  
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	4.9	mg/L		0.1		E200.7	09/07/07 14:07 / jjw

Report Definitions: RL - Analyte reporting limit.  
QCL - Quality control limit.

MCL - Maximum contaminant level.  
ND - Not detected at the reporting limit.



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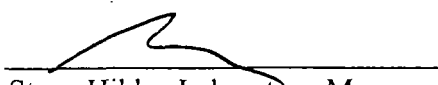
09/14/2007

Point Ruston  
5219 N. Shirley St.,  
Suite 100  
Tacoma, WA 98407

Project: Stack Hill/Air Monitoring  
Date Received: 09/10/2007  
Spectra Project: 2007090119

<u>Client ID</u>	<u>Spectra #</u>	<u>Analyte</u>	<u>Result</u>	<u>Units</u>	<u>Method</u>	<u>Matrix</u>	<u>Date Sampled</u>
082007-181	1	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	08/20/2007
082007-719	2	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	08/20/2007
082007-333	3	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	08/20/2007
082407-181	4	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	08/24/2007
082407-719	5	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	08/24/2007
082407-333	6	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	08/24/2007
082707-181	7	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	08/27/2007
082707-179	8	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	08/27/2007
082707-333	9	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	08/27/2007
090707-181	10	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/07/2007
090707-719	11	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/07/2007
090707-333	12	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/07/2007

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Steve Hibbs, Laboratory Manager

a8/scj



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09/20/2007

Point Ruston  
5219 N. Shirley St.,  
Suite 100  
Tacoma, WA 98407

Project: Air Monitoring/Stack Hill  
Date Received: 09/17/2007  
Spectra Project: 2007090251

<u>Client ID</u>	<u>Spectra #</u>	<u>Analyte</u>	<u>Result</u>	<u>Units</u>	<u>Method</u>	<u>Matrix</u>	<u>Date Sampled</u>
091007-719	1	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/10/2007
091007-181	2	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/10/2007
091007-333	3	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/10/2007
091107-181	4	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/11/2007
091107-719	5	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/11/2007
091107-333	6	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/11/2007
091207-333	7	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/12/2007
091207-181	8	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/12/2007
091207-719	9	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/12/2007
091307-123	10	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/13/2007
091307-719	11	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/13/2007
091307-646	12	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/13/2007
091407-719	13	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/14/2007
091407-123	14	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/14/2007

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09/20/2007

Point Ruston  
5219 N. Shirley St.,  
Suite 100  
Tacoma, WA 98407

Project: Air Monitoring/Stack Hill  
Date Received: 09/17/2007  
Spectra Project: 2007090251

<u>Client ID</u>	<u>Spectra #</u>	<u>Analyte</u>	<u>Result</u>	<u>Units</u>	<u>Method</u>	<u>Matrix</u>	<u>Date Sampled</u>
091407-181	15	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/14/2007

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Steve Hibbs, Laboratory Manager

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10/11/2007

Point Ruston  
5219 N. Shirley St.,  
Suite 100  
Tacoma, WA 98407

Project: Stack Hill/Air Monitoring  
Date Received: 10/01/2007  
Spectra Project: 2007100024

<u>Client ID</u>	<u>Spectra #</u>	<u>Analyte</u>	<u>Result</u>	<u>Units</u>	<u>Method</u>	<u>Matrix</u>	<u>Date Sampled</u>
091907-646	1	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/19/2007
091907-719	2	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/19/2007
091907-123	3	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/19/2007
092007-181	4	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/20/2007
092007-646	5	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/20/2007
092007-123	6	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/20/2007
092107-123	7	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/21/2007
092107-719	8	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/21/2007
092107-181	9	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/21/2007
092407-333	10	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/24/2007
092407-646	11	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/24/2007
092407-181	12	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/24/2007
092507-646	13	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/25/2007
092507-123	14	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/25/2007

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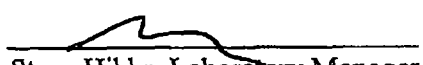
10/11/2007

Point Ruston  
5219 N. Shirley St.,  
Suite 100  
Tacoma, WA 98407

Project: Stack Hill/Air Monitoring  
Date Received: 10/01/2007  
Spectra Project: 2007100024

<u>Client ID</u>	<u>Spectra #</u>	<u>Analyte</u>	<u>Result</u>	<u>Units</u>	<u>Method</u>	<u>Matrix</u>	<u>Date Sampled</u>
092507-719	15	Arsenic	< 0.1	µg/m3	SW846 7060A	Air Cassette	09/25/2007

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Steve Hibbs, Laboratory Manager

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